

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Anthony Martinez et al. v. Zhejiang Huahai  
Pharmaceuticals Co., Ltd. et al.*

Case No. 1:19-cv-12143

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF CELESTINE DARING**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendant Mylan Pharmaceuticals Inc. will take the deposition upon oral examination of Celestine Daring, on **April 19, 2021 at 9:00 a.m. EST** and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Frank H. Stoy  
Pietragallo Gordon Alfano  
Bosick & Raspanti, LLP  
One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 263-4397

Date: March 23, 2021

Respectfully submitted,

s/ Clem C. Trischler

Clem C. Trischler, Esq.  
Pietragallo Gordon Alfano Bosick & Raspanti,  
LLP

One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 263-1816

[cct@pietragallo.com](mailto:cct@pietragallo.com)

*Attorney for Defendant Mylan  
Pharmaceuticals Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Clem C. Trischler

Clem C. Trischler, Esq.

Pietragallo Gordon Alfano Bosick & Raspanti,  
LLP

One Oxford Centre, 38<sup>th</sup> Floor

Pittsburgh, PA 15219

(412) 263-1816

*Attorney for Defendant Mylan  
Pharmaceuticals Inc.*